



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 7, 2012

HELENE KEELEY, TREASURER  
DEMOCRATIC STATE COMMITTEE  
(DELAWARE)  
P.O. BOX 2065  
WILMINGTON, DE 19899

**Response Due Date**  
**10/12/2012**

IDENTIFICATION NUMBER: C00211763

REFERENCE: APRIL MONTHLY REPORT (03/01/2012 - 03/31/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Your report discloses \$7,309.90 from "Chris Coons for Delaware," "First State PAC," and "DNC Travel Off-Set Account" in Offsets to Operating Expenditures on Line 15 of the Detailed Summary Page. Please be advised that if there are not corresponding expenditures for these entries, it may constitute an excessive or prohibited contribution. Please amend your report or provide an explanation for this apparent discrepancy. (2 U.S.C 434(b) & 11 CFR § 104.3(a) and (b))
2. Your 2012 February Monthly (1/1/12 - 1/31/12), March Monthly (2/1/12 - 2/29/12), and April Monthly (3/1/12 - 3/31/12) Reports combined do not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.
3. Schedule L of your report discloses "Non Federal - Levin" as the name of

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account for your Levin funds, which appears to be an account that functions as both a non-federal account and a Levin account. In addition, Schedule L-B of your report discloses the disbursement of Levin funds. Pursuant to 11 CFR §300.30(c)(3)(ii), if an account that functions as both a non-federal account and a Levin account is used, you must demonstrate through a reasonable accounting method approved by the Commission that whenever a disbursement of Levin funds is made, you have received sufficient contributions or Levin funds to make such a disbursement. Please provide clarifying information regarding your accounting method. Please note that it may be necessary to petition the Commission in the form of an Advisory Opinion request.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Jones', with a stylized flourish at the end.

Brian Jones  
Campaign Finance Analyst  
Reports Analysis Division